

1 EDMUND G. BROWN JR.
2 Attorney General of California
3 SANDRA GOLDBERG
4 Deputy Attorney General
5 State Bar No. 138632
6 LAURA J. ZUCKERMAN
7 Deputy Attorney General
8 State Bar No. 161896
9 1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 622-2174
Fax: (510) 622-2270
E-mail: Laura.Zuckerman@doj.ca.gov
*Attorneys for People of the State of California ex rel.
Edmund G. Brown Jr., Attorney General of the State
of California*

10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13
14

15 **PEOPLE OF THE STATE OF**
16 **CALIFORNIA EX REL. EDMUND G.**
17 **BROWN JR., ATTORNEY GENERAL OF**
18 **THE STATE OF CALIFORNIA,**

Plaintiff,

19 v.
20
21 **UNITED STATES ENVIRONMENTAL**
22 **PROTECTION AGENCY,**

Defendant.

Case No.: C08-00735 SC

**STIPULATION AND [PROPOSED]
ORDER RE DISMISSAL AND ENTRY
OF JUDGMENT**

Date: Not set.
Time: Not set.
Courtroom: 1, 17th Floor
Judge: Hon. Samuel Conti
Trial Date: Not set.
Action Filed: January 31, 2008

23 Plaintiff People of the State of California *ex rel.* Edmund G. Brown Jr., Attorney General of
24 the State of California (“People”) and defendant United States Environmental Protection Agency
25 (“EPA”) hereby stipulate and agree as follows:
26
27
28

1 WHEREAS EPA has produced the *Vaughn* Index the Court ordered it to produce on August
2, 2008, together with documents called for by the People's Freedom of Information Act request;
3 and

4 WHEREAS the People do not intend to seek any further relief in this case; accordingly,
5 IT IS HEREBY STIPULATED by and between the parties, through their respective
6 counsel, that:

- 7 1. This action shall be dismissed with prejudice, and a stipulated judgment entered;
8 2. No party may recover any costs, attorneys' fees, or monetary recovery for this action;
9 and
10 3. This stipulation may be signed in counterpart, and facsimile signatures shall have the
11 same force and effect as originals.

12
13 Dated: March 10, 2009

14
15
16 /S/
17 ISAAC R. CAMPBELL
United States Department of Justice
Civil Division, Federal Programs Branch

18
19
20 /S/
21 SANDRA GOLDBERG
LAURA J. ZUCKERMAN
Attorneys for People of the State of
California *ex rel.* Edmund G. Brown Jr.,
Attorney General of the State of California

22
23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: March 11, 2009

25
26
27 OK2008900039
90107910.doc

